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10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) **CASE NO. 16-cr-00047 EJD**
15 Plaintiff,) **NOTICE OF DISMISSAL**
16 v.)
17 JONATHAN CHANG,)
a/k/a RuWu Charng, and)
18 GRACE CHANG,)
a/k/a Wei-Lin Chang,)
19 Defendants.)
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22 With leave of the Court, and pursuant to Federal Rule of Criminal Procedure 48(a), the United
23 States Attorney for the Northern District of California dismisses certain counts in the above indictment
24 without prejudice as follows:

25 **I. DEFENDANT JONATHAN CHANG A/K/A RUWU CHARNG**

26 As to defendant Jonathan Chang, the government moves to dismiss:

- 27 • Count 1: Conspiracy to Commit Wire or Mail Fraud (18 U.S.C. § 1349)
28

NOTICE OF DISMISSAL
No. CR 16-00047 EJD
7/10/2018

v.

FILED
JAN - 6 2020
SUBAN Y. BOONG
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

- Count 6: Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h))

II. DEFENDANT GRACE CHANG A/K/A WEI-LIN CHANG

As to defendant Grace Chang, the government moves to dismiss all counts, specifically:

- Count 1: Conspiracy to Commit Wire or Mail Fraud (18 U.S.C. § 1349)
- Counts 2, 3, 4, and 5: Wire Fraud (18 U.S.C. § 1343)
- Count 6: Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h))
- Counts 7, 8, and 9: Money Laundering (18 U.S.C. § 1956(a)(1)(B)(i))

DATED: January 6, 2019

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/ _____
HALLIE HOFFMAN
Chief, Criminal Division

Leave is granted to the government to dismiss without prejudice certain counts in the indictment against:

1. Jonathan Chang:

- Count 1: Conspiracy to Commit Wire or Mail Fraud (18 U.S.C. § 1349)
- Count 6: Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h))

2. Grace Chang:

- Count 1: Conspiracy to Commit Wire or Mail Fraud (18 U.S.C. § 1349)
- Counts 2, 3, 4, and 5: Wire Fraud (18 U.S.C. § 1343)
- Count 6: Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h))
- Counts 7, 8, and 9: Money Laundering (18 U.S.C. § 1956(a)(1)(B)(i))

Date: 1/6/2020


HON. EDWARD J. DAVILA
United States District Judge